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San Gabriel Valley Economic Partnership

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February 28, 2006

Dr. Alan Lloyd
Secretary, CalEPA
1001 "I" Street
Sacramento, CA 95814

Ms. Catherine Witherspoon
CalEPA
1001 "I" Street
Sacramento, CA 95814

Re: Draft Emission Reduction Plan for Ports and International Goods Movement in California

Dear Dr. Lloyd and Ms. Witherspoon:

Thank you for the opportunity to comment on the Draft ARB Emission Reduction Plan.

The San Gabriel Valley is a region significantly impacted by the goods movement industry. In addition to impacts associated with transportation congestion, our Valley is also impacted by direct pollution from goods movement (by freight, truck, and air), as well as indirect pollution caused increased vehicle emissions caused by higher levels of congestion. As a region, industries and development associated with goods movement are also of critical importance to our current economy and to its future growth. As such, we understand that the key to attaining a better overall quality of life must come through creative, efficient, and cost-effective solutions.

One of the great strides the ARB has made in recent years is its decision to focus on developing partnerships with the private sector to help our state preserve and restore our environment. The ARB's Memorandum of Understanding/Statewide Rail Yard Agreement to Reduce Diesel PM at California Rail Yards is an example of this kind of mutual collaboration between the private and public sectors, which can work to resolve public sector concerns without resorting to litigation or formal regulation. It is our hope that ARB can duplicate this model throughout the state in implementing the Emission Reduction Plan.

A key incentive for private sector cooperation is the use of incentive-based programs. Two important environmental applications of this approach could be to encourage cleaner behavior by ships in our ports and to encourage better maintenance behavior in all parts of the goods movement industry.

As we know, ships constitute a significant source of pollution in Southern California. However, the state of California has relatively limited jurisdiction over their behavior. Establishing incentive programs to promote dockside power, slower speeds near the coast, and other environmentally friendly behavior would help to reduce emissions quickly and at a comparatively low cost, particularly if the program is designed in conjunction with the ports of Long Beach and Los Angeles.

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At the same time, the proper maintenance of all vehicles involved in the goods movement industry is critical to minimizing pollutant emissions. An incentive program to guarantee that this occurs would no doubt be welcomed by the private sector, while also helping the state and our region to contain emissions at minimal cost to the state.

This approach could also be applied to the Carl Moyer Fund program by decreasing the administrative burdens associated with the program and decreasing some of the more strenuous project requirements (particularly the policy that projects achieve great reductions than required by regulation or statute) to allow more districts to take part in the program.

In terms of the findings of the Emission Reduction Plan, we would like to draw attention to the differentiation made between domestic and international goods. It is difficult to truly differentiate between purely domestic and international trips, especially when one considers that many purely domestic trips, such within the drayage industry and the return of empty containers and chassis to ports are closely linked to international trade activities.

It is important that the state move all freight, international and domestic, in a cleanly and economically, and differentiating between freight activities does advance this. It is our view that a single MOU or similar agreement to regulate this freight would best serve California's interest in this regard.

We recognize that the CalEPA staff has invested a tremendous amount of effort into creating this Emission Reduction Plan, devoting their energies to facilitating stakeholder involvement and discussion. This Plan is a significant step towards creating a unified environmental plan for California, and we applaud your efforts.

Sincerely,



Bill Carney
President & CEO